

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

PEOPLE FOR THE ETHICAL TREATMENT
OF ANIMALS, INC.,

Plaintiff,

v.

MICHAEL K. YOUNG, in his official capacity
as President of Texas A&M University,

Defendant.

Civil Action No. 4:18-cv-01547

JOINT STATUS REPORT

Pursuant to the court's March 5, 2019 order, the parties hereby jointly report on the status of this matter:

1. On February 27, 2019, Plaintiff People for the Ethical Treatment of Animals, Inc. ("PETA") served its responses to the defendant Texas A&M's (TAMU) discovery. PETA has produced responsive documents on a rolling basis. On March 5, 2019, PETA produced the first set of documents responsive to TAMU's requests for production. On March 6, 2019, PETA produced the second set of documents responsive to TAMU's requests for production. On March 13, 2019, PETA produced the third set of records responsive to TAMU's requests for production. PETA produced the fourth and final set of records on March 15, 2019. Defendant's review of those documents is ongoing. TAMU requests additional time to review Plaintiff's discovery responses and production, and to resolve any issues with PETA concerning deficiencies in Plaintiff's production.

2. The parties have discussed and continue to consider the possibility of mediation.

3. PETA is prepared to move for summary judgment and intends, barring the court's objection, to file such a motion soon. PETA believes that the material issues of fact have been established or admitted to, and that cross-motions for summary judgment are the best way of bringing this case to resolution. In so stating this preference, PETA does not waive its right to conduct discovery should that process continue. TAMU disagrees with PETA's position that this case is ripe for summary judgment. Given the status of discovery, TAMU believes that a motion for summary judgment would be premature and is likely to oppose any such motion on that basis.

Dated: March 15, 2019

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on March 15, 2019, a true and correct copy of the foregoing was served via the Court's electronic filing service upon all counsel of record

/s/ María Amelia Calaf
María Amelia Calaf